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9 Attorneys for Defendant
10 KNOWLEDGESTORM, INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION
13

14 JASBIR GILL, MAHMOUD
KEDKAD,

15 Plaintiffs,

16 v.

17 KNOWLEDGESTORM, INC., a
18 corporation, DOES 1 through 50,

19 Defendants.
20
21

Case No. C 07-04112 PVT

**NOTICE OF SETTLEMENT
BETWEEN PLAINTIFFS JASBIR
GILL AND DEFENDANT
KNOWLEDGESTORM, INC.**

Action filed: July 13, 2007
Trial date: August 4, 2008

1 TO THE HONORABLE COURT:

2 PLEASE TAKE NOTICE that Plaintiffs Jasbir Gill and Mahmoud Kedkad
3 (“Plaintiffs”) and defendant KnowledgeStorm, Inc. (“Defendant”) (collectively the
4 “parties”) have reached a confidential settlement as of May 24, 2008, in the above-
5 entitled action.

6 The parties respectfully request this Court to set a hearing for an Order to
7 show cause regarding dismissal in 60 days to allow the parties a sufficient amount
8 of time to draft and enter into formal settlement agreements, and to perform all of
9 the terms and conditions therein.

10 Accordingly, Defendant requests that its following law and motion hearings
11 be taken off calendar, pending completion of the settlement:

12 (1) motion for summary judgment or, in the alternative, partial summary
13 judgment against Plaintiff Gill, which is currently scheduled to be heard by the
14 Honorable Patricia V. Trumbull, U.S. Magistrate Judge, on June 3, 2008, at 10:00
15 a.m.;

16 (2) motion for summary judgment or, in the alternative, partial summary
17 judgment against Plaintiff Kedkad, which is currently scheduled to be heard by the
18 Honorable Patricia V. Trumbull, U.S. Magistrate Judge, on June 3, 2008, at 10:00
19 a.m.;

20 (3) motion for severance of Plaintiffs, which is currently scheduled to be
21 heard by the Honorable Patricia V. Trumbull, U.S. Magistrate Judge, on June 3,
22 2008, at 10:00 a.m.; and

23 (4) motion to compel further responses and documents against Plaintiff
24 Kedkad, which is currently scheduled to be heard by the Honorable Patricia V.
25 Trumbull, U.S. Magistrate Judge, on June 17, 2008, at 10:00 a.m.

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1 Similarly, Plaintiff Kedkad requests that his following law and motion
2 hearing be taken off calendar, pending completion of the settlement:

3 (a) application for order to enlarge time to file the opposition to the
4 motion for summary judgment against Plaintiff Kedkad, which is to be heard by the
5 Honorable Patricia V. Trumbull, U.S. Magistrate Judge.

6 Furthermore, the parties request this Court to vacate the current trial date of
7 August 4, 2008, and all related pretrial dates and deadlines, pending completion of
8 the settlement.

9
10 Dated: May 28, 2008

LAMBERTO & KREGER

11
12 By: /s/ Brian S. Kreger

13 Brian S. Kreger
14 Attorneys for Plaintiffs
JASBIR GILL AND
MAHMOUD KEDKAD

15
16 Dated: May 28, 2008

FORD & HARRISON LLP

17
18 By: /s/ Steven M. Kroll

19 Jeffrey D. Mokotoff
20 Steven M. Kroll
21 Attorneys for Defendant
KNOWLEDGESTORM, INC.

PROOF OF SERVICE

I, Yolanda Dennison, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 350 South Grand Avenue, Suite 2300, Los Angeles, California 90071. On May 28, 2008, I served a copy of the within document(s):

NOTICE OF SETTLEMENT BETWEEN PLAINTIFFS JASBIR GILL AND DEFENDANT KNOWLEDGESTORM, INC.

- ☒ (Electronic-Mail) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document to be sent to the persons at the e-mail address listed. I did not receive, within reasonable time after submission, any electronic message or other indication the transmission was unsuccessful pursuant to the CM/ECF system of the United States District Court for the Northern District of California.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

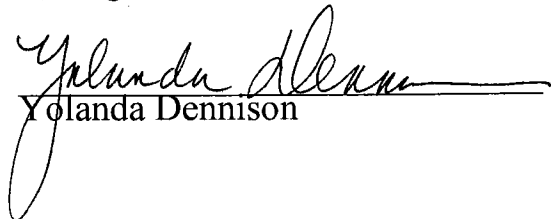
Brian S. Kreger, Esq.
Lamberto & Kreger
160 W. Santa Clara St., Suite 1050
San Jose, CA 95113

Attorneys for Plaintiffs
Tel: 408-999-0300
Fax: 408-999-0301

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed this 28th day of May, 2008 Los Angeles, California.


Yolanda Dennison